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February 2, 2024

By ECF

Honorable Joseph A. Marutollo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Camden Plaza East
Brooklyn, New York 11201

Re: Dalmau v. City of New York
No. 22-CV-06326 (DG) (JAM)

Dear Judge Marutollo:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for the defendant City of New York in the above-referenced matter. Defendant writes, on behalf of the parties, in accordance with Your Honor's Order to file a status report. See Minute Entry Order dated January 12, 2024.

Defendant turned over 25 comparator files to Plaintiff yesterday, February 1st. Defendant is still in the process of collecting emails that may be responsive to Plaintiff's discovery requests and will produce them on a rolling basis by February 23, 2024. Depositions have yet to be scheduled. As noted in Defendant's letter motion requesting a 90-day extension of the fact discovery deadline dated January 10, 2024, the undersigned will be on leave starting today until February 9, and returning February 12th. ECF Doc. No. 19. The parties will confer and work cooperatively to schedule and conduct Plaintiff and Defendant's depositions for mid to late February. The current deadline for fact discovery is March 1, 2024.

The parties thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/

Dominique Anglade
Assistant Corporation Counsel

cc: Steven Warshawsky (via ECF)
The Warshawsky Law Firm
Attorneys for Plaintiff